

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Western District of Texas**FILED**

March 26, 2024

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXASBY: MG CIENEGA  
DEPUTY

United States of America

v.

Johan Martinez

Case No.

**DR:24-M-835**Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 03/25/2024 in the county of Maverick in the  
Western District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 554	did unlawfully, knowingly, and intentionally export or attempt to export any merchandise, from the United States contrary to any law or regulation of the United States.

This criminal complaint is based on these facts:

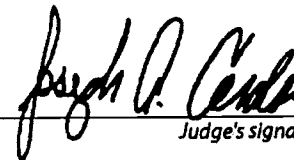
See Attachment A

☒ Continued on the attached sheet.

Complainant's signature

Jiselle Castro, HSI/Special Agent  
Printed name and title

Sworn to before me and signed in my presence.

Date: 3/26/2024

Judge's signature

City and state: Del Rio, TexasJoseph Cordova, United States Magistrate Judge  
Printed name and title

**DR:24-M-835**

**ATTACHMENT A**

On March 25, 2024, at approximately 0100hrs, Johan Ancelmo Martinez was encountered by Customs and Border Protection (CBP) Officers at the Camino Real International bridge #2 in Eagle Pass, Texas during outbound inspections. Martinez was the driver of a blue 2020 Chevrolet truck bearing Texas license plates (TBR7008). Martinez gave CBP a negative declaration for firearms, ammunition, and money in excess of ten thousand US dollars. Martinez was referred to the side for secondary inspection.

During secondary inspection, officers queried a vehicle identification number (VIN#) 1GCRWCED3LZ367672 and revealed that truck was reported as stolen to the Houston Police Department on February 10, 2024.

Martinez and two (2) passengers were taken into custody. During a pat down of Martinez, CBP Officers located a firearm in Martinez pants. The firearm, a Smith and Wesson, model# SW9VE, serial # RBY5761, was reported as stolen to the Fort Bend County Sheriffs' Office.

Homeland Security Investigations (HSI) responded and interviewed Martinez. Martinez was read his Miranda Rights and Martinez agreed to interview without an attorney present. Martinez told agents he knew it was unlawful to export a firearm out of the United States. Martinez further told agents that he was taking the firearm to Honduras to have it as protection.

Martinez further told agents he purchased the stolen Chevrolet truck and was going to sell it in Honduras.